

**LAW OFFICES OF DALE K. GALIPO**

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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JENNIE QUAN, individually and as  
successor in interest to BENJAMIN  
CHIN, deceased,

Plaintiffs,

vs.

COUNTY OF LOS ANGELES; and  
DOES 1-10, inclusive,

Defendants.

Case No. 2:24-cv-04805-MCS-KS

*Assigned to:*

Hon Mark C. Scarsi

Hon. Mag. Judge Karen L. Stevenson

**STIPULATION FOR ORDER  
GRANTING LEAVE FOR  
PLAINTIFF TO FILE FIRST  
AMENDED COMPLAINT**

1 **TO THE HONORABLE COURT:**

2 Plaintiff Jennie Quan and Defendant County of Los Angeles, by and through  
3 their respective attorneys of record, hereby stipulate as follows:

4 1. Plaintiff filed the operative complaint in this action on June 7, 2024  
5 (Doc. No. 1), alleging that Los Angeles County Sheriff's Deputies were involved in  
6 officer-involved shooting death of her son, Benjamin Chin. At the time Plaintiff filed  
7 her Complaint, she did not know the identities of the involved sheriff's deputies.

8 2. After the complaint was filed, Plaintiff's counsel was able to ascertain  
9 the identities of the shooting officers in this incident through a Los Angeles Sheriff's  
10 Department press release.

11 3. The parties have met and conferred and agree that good cause exists to  
12 request an order granting Plaintiff leave to file a First Amended Complaint.

13 4. Specifically, Plaintiff seeks to file a First Amended Complaint to name  
14 Marisol Barajas as defendant Doe 1 and Hector Vazquez as defendant Doe 2.  
15 Plaintiff also seeks to correct the following typos in the original complaint: (1)  
16 changing "LAPD" to "LASD" (Compl. at 3:15, 3:16, 3:19, 3:21, 15:2); (2) changing  
17 "CPD" to "LASD" (Compl. at 15:4); (3) changing "Plaintiff" to "DECEDENT"  
18 (Compl. at 16:11, 16:13, 16:15, 16:17, 16:23); (4) striking "ANTHONY  
19 ALVARADO" (Compl. at 19:3); and (5) changing "officers" or "police officers" to  
20 "sheriff's deputies" (Compl. at 15:4, 15:10, 19:8).

21 5. The First Amended Complaint shall serve as the operative complaint in  
22 the above-referenced litigation. A redlined version of the First Amended Complaint is  
23 attached hereto as Exhibit "A", pursuant to Local Rule 15 and this Court's Civil  
24 Standing Order. Plaintiff shall file her First Amended Complaint no later than seven  
25 (7) days after the date of the Court's Order approving this stipulation. Defendants'  
26 response to Plaintiff's First Amended Complaint shall be served and filed no later  
27 than twenty-one (21) days after the date of service.

1 IT IS SO STIPULATED.

2  
3 DATED: October 7, 2024

LAW OFFICES OF DALE K. GALIPO

4  
5 By /s/ Hang D. Le

6 Dale K. Galipo

7 Hang D. Le

8 Attorneys for Plaintiff

9  
10  
11 DATED: October 7, 2024

HURRELL CANTRALL LLP

12  
13  
14 By Janet J. Hur\*

15 Thomas C. Hurrell

16 Janet J. Hur

17 Jerad J. Miller

18 Attorneys for Defendant, County of Los  
19 Angeles

20 \*The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose  
21 behalf the filing is submitted, concur with the filing's content and have authorized the  
22 filing.  
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